

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
WESTERN DIVISION

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AMERICAN ZURICH INSURANCE )  
COMPANY and ZURICH AMERICAN )  
INSURANCE COMPANY, )  
Plaintiffs, ) Case No. 20-cv-5026  
v. )  
J. CRISMAN PALMER and GUNDERSON, )  
PALMER, NELSON & ASHMORE, LLP, )  
Defendants. )  
STATE OF SOUTH DAKOTA )  
:ss  
COUNTY OF MINNEHAHA )

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**AFFIDAVIT OF KRISTIN N. DERENGE  
DATED MARCH 8, 2023**

1. I am one of the attorneys representing the Defendants, J. Crisman Palmer and Gunderson, Palmer, Nelson & Ashmore, LLP, in the above-captioned matter.

2. The attachments to this affidavit are deposition transcripts and deposition exhibits in this matter. For the Court's ease of reference, the exhibits continue the same numbering as their numbering during the depositions.

3. Attached hereto as **Exhibit G** is a true and accurate copy of the excerpts of the additional relevant portions of the deposition transcript of Mike Abourezk in the above-entitled matter.

4. Attached hereto as **Exhibit H** is a true and accurate copy of the excerpts of the additional relevant portions of the deposition transcript of Bill Fuller in the above-entitled matter.

Dated this 8<sup>th</sup> day of March, 2023.

*Kristin N. Derenge*  
Kristin N. Derenge

Subscribed and sworn to before me  
this 8<sup>th</sup> day of March, 2023.

*Tricia Ann Johnson*  
Notary Public – South Dakota  
My commission expires: 6/1/2024

